## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

In Re: Tricia Ann Routt, : Case No. 24-50147

Debtor. : Chapter 13

: Judge Mina Nami Khorrani

## LOGAN COUNTY TREASURER'S OBJECTION TO CONFIRMATION OF DEBTOR'S FOURTH AMENDED PLAN

Now comes the Logan County Treasurer (the "Treasurer"), by and through counsel, and objects to the confirmation of the Fourth Amended Chapter 13 Plan of Debtor Tricia Routt filed herein on April 17, 2024 (Doc. No. 30) (the "Plan"). By reference, the Treasurer incorporates the Chapter 13 Trustee's Objection to Confirmation filed herein on April 24, 2024 (Doc No. 32).

Debtor has failed to make the post-petition payment of real estate taxes due the Treasurer on February 7, 2024 in the amount of \$828.25. Debtor's Schedules I and J do not accurately reflect Debtor's Income and Expenses.

Debtor's plan does not adequately satisfy the best interest of creditors as required by 11 U.S.C. 1325 based on the value of the real property and whether or not Debtor is entitled to a homestead exemption for the property.

Pursuant to 11 U.S.C. § 1325(a)(1), the Court should deny confirmation of the Plan.

/s/ Paul H. Shaneyfelt

Paul H. Shaneyfelt (0065629)

315 Public Square

Suite 204

Troy, Ohio 45373

Telephone: (937) 216-7727 Facsimile: (937) 552-9954

E-mail: <u>paulshaneyfeltlaw@gmail.com</u>

Attorney for Logan County, Ohio

Treasurer

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the date shown below a copy of the Logan County Treasurer's Objection to Confirmation of Debtor's Fourth Amended Plan was served electronically on the Office of the United States Trustee, the Chapter 13 Trustee and Debtor's attorney, and on the Debtor by regular first class mail, postage prepaid.

Dated: April 30, 2024 /<u>s/ Paul H. Shaneyfelt</u> Paul H. Shaneyfelt